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Marlene H. Dortch
Secretary – Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

RE: Joint Petition for Waivers of the Definition of “Study Area” of the Appendix-Glossary of Part 36 of the Commission’s Rules and Section 69.3(e)(11), CC Docket No. 96-45

Dear Ms. Dortch,

On October 26, 2005, Twin Valley Telephone, Inc. (“Twin Valley”) filed a joint petition with United Telephone Company of Eastern Kansas and United Telephone Company of Kansas (together “United”) for a waiver of the study area boundary freeze, as codified in the Appendix – Glossary of Part 36 of the Commission’s rules.¹ Grant of this waiver would facilitate Twin Valley’s purchase of thirteen (13) exchanges from United and allow the exchanges, which consist of approximately 5300 access lines, to be removed from United’s study areas and added to Twin Valley’s existing Kansas study area. Twin Valley and United seek to close the transaction on or about February 1, 2006.

Additionally, Twin Valley requests a waiver of Section 69.3(e)(11) of the Commission’s rules in order to be allowed to continue to use NECA as its tariff pool administrator and to avoid being forced to wait until the next annual access tariff filing effective date to bring the acquired lines into the common line tariff.

NECA has reviewed the petition and has no objection to inclusion of the additional exchanges in the NECA tariff as this would create no undue administrative burden for NECA.

Sincerely,

/s/ Regina McNeil

CC: Cathy Carpino - Wireline Competition Bureau, FCC
Gary Seigel - Wireline Competition Bureau, FCC
David Cosson - Kraskin, Moorman, & Cosson, LLC

¹ Joint Petition for Waiver of the Definition of “Study Area” of the Appendix-Glossary of Part 36 of the Commission’s Rules, Petition for Waiver of Sec. 69.3(e)(11) of the Commission’s Rules, CC Docket No. 96-45, filed October 26, 2005 (Study Area Waiver Petition).